

1 Richard A. Wright, Esq.
2 Nevada Bar No. 886
3 Wright Marsh & Levy
4 300 S. Fourth Street, Suite 701
5 Las Vegas, NV 89101
Phone: (702) 382-4004
Fax: (702) 382-4800
rick@wmllawlv.com

6 Robert M. Draskovich, Esq.
7 Nevada Bar No. 6275
8 Draskovich Law Group
9 815 S. Casino Center Boulevard
Las Vegas, NV 89101
Phone: (702) 474-4222
Fax: (702) 474-1320
robert@draskovich.com

11 Attorneys for Defendant Cameron Collings

12

13 **United States District Court**

14 **District of Nevada**

15 United States of America,

16 Plaintiff,

17 v.

18 Cameron Collings,

19 Defendant,

20 Case No. 2:19-cr-00311-JCM-DJA

21 Stipulation to Modify Conditions of Supervision
(Fourth Request)

22 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United
23 States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the United States,
24 and Richard A. Wright Esq., of Wright Marsh & Levy, and Robert Draskovich Esq., of Draskovich
25 Law Group, counsel for the Defendant, Cameron Collings, that the conditions of his pretrial release be
modified to ease current travel restrictions and other pretrial conditions for the purposes of Mr. Collings
26 self-surrender to FCI Terminal Island on October 23, 2020 at 2:00 p.m. The U.S. Pretrial Office further
27 agrees with this request.

1 This Stipulation is entered into for the following reasons:

1. The parties resolved this case preindictment. On January 2, 2020, a waiver of indictment, arraignment and change of plea hearing were held. ECF 5, 7. At that time, Mr. Collings pled guilty, by way of plea agreement, to one count receipt of child pornography in violation of 18 U.S.C. §§ 2252A(a)(2)(A) and (B)(1). ECF 3, 5, 7. A personal recognizance bond (PR bond) was entered. ECF 9.

2. On June 26, 2020, Mr. Collings was sentenced to 87 months' imprisonment and the Court ordered a self-surrender date of October 23, 2020. ECF 25, 26. The Judgment of Conviction was entered on July 2, 2020. ECF 26.

3. Mr. Collings has been on pretrial release since January 2, 2020 with no significant violations.

4. The parties and Pretrial Services recommend modifying his current pretrial conditions to allow for his travel outside of Clark County for the purposes of self-surrendering at FCI Terminal Island. Below is the proposed language for consideration:

- That current travel restrictions be modified to allow for travel outside of Clark County from October 21-October 23, 2020 for the purposes of self-surrendering at FCI Terminal Island on October 23, 2020 at 2:00 pm.
 - That defendant's location monitoring equipment be removed by October 21, 2020 to allow for said travel thereafter.
 - All other conditions of pretrial release (including the curfew condition) would remain in effect until defendant self-surrenders at FCI Terminal Island.

DATED October 15, 2020.

WRIGHT MARSH & LEVY

NICHOLAS A. TRUTANICH
United States Attorney

By: /s/ Richard A. Wright

Richard A. Wright
Robert Draskovich
Attorneys for Mr. Collings

By: /s/ *Supriya Prasad*

Supriya Prasad
Assistant United States Attorney

**United States District Court
District of Nevada**

United States of America,

Plaintiff,

V.

Cameron Collings,

Defendant,

Case No. 2:19-cr-00311-JCM-DJA

Order Granting Modification of
Pretrial Release Conditions

Pursuant to the Stipulation of the Parties and for good cause appearing:

IT IS HEREBY ORDERED: that the conditions of Defendant Collings' pretrial release be modified as follows:

- That current travel restrictions be modified to allow for travel outside of Clark County from October 21-October 23, 2020 for the purposes of self-surrendering at FCI Terminal Island on October 23, 2020 at 2:00 pm.
 - That defendant's location monitoring equipment be removed by October 21, 2020 to allow for said travel thereafter.
 - All other conditions of pretrial release (including the curfew condition) would remain in effect until defendant self-surrenders at FCI Terminal Island.

IT IS SO ORDERED.

DATE: October 16, 2020.

Honorable James C. Mahan
United States District Judge